



## **Opal Disposables Limited Modern Slavery Policy**

### **1. Introduction**

1.1 At Opal Disposables Ltd, we recognise that modern slavery and human trafficking are severe violations of human rights. Modern slavery includes forced labour, servitude, and human trafficking, all involving exploitation for personal or commercial gain.

1.2 We are committed to a zero-tolerance approach to modern slavery in all business dealings. Our policies ensure transparency, integrity, and ethical practices across our operations and supply chains.

### **2. Our Business and Supply Chains**

2.1 Opal Disposables Ltd manufactures and supplies disposable curtains, cubicle tracks, and blinds, primarily serving the NHS and private medical sector.

2.2 Our operations involve partnerships with suppliers for raw materials, manufacturing components, and distribution services. We prioritise ensuring that our supply chains are free from slavery and human trafficking risks.

### **3. Understanding Modern Slavery Risks**

3.1 We acknowledge risks associated with the geographical and sectoral contexts of our supply chain, particularly:

- Raw materials sourced from regions with weak labour laws.
- Transportation services in global distribution networks.
- Industries where low-wage or informal work is prevalent.

3.2 We assess these risks regularly and incorporate findings into our risk mitigation strategies.

### **4. Due Diligence Processes**

4.1 We have established robust processes to identify, prevent, and mitigate risks of modern slavery, including:

- Supply Chain Mapping: Conducting end-to-end mapping to understand risks associated with vulnerable groups, locations, and work types.
- Supplier Audits: Conducting routine audits and requiring suppliers to complete modern slavery compliance questionnaires.
- Monitoring and Escalation: Ensuring that any breaches of our policy are addressed through corrective actions or termination of contracts.

### **5. Grievance Mechanisms and Escalation**

5.1 All employees and supply chain workers have access to anonymous whistleblowing mechanisms to report suspected cases of modern slavery.

5.2 We have clear escalation procedures for investigating and responding to grievances, including collaborating with law enforcement and victim support organisations when necessary.

## **6. Training and Awareness**

6.1 We provide mandatory modern slavery training to all employees and key supply chain partners to raise awareness about human trafficking risks.

6.2 Training hours are tracked and updated annually to ensure ongoing capacity building.

6.3 Employees are informed about whistleblowing mechanisms during onboarding and through regular communication campaigns (e.g., posters, emails, and team meetings).

## **7. Stakeholder Collaboration**

7.1 We actively work with NGOs, trade unions, and multi-stakeholder initiatives to address modern slavery risks.

7.2 We engage with organisations such as the Ethical Trading Initiative (ETI) to benchmark and improve our practices.

## **8. Policies and Practices**

8.1 Our recruitment practices ensure that:

- Pre-employment checks are conducted for all hires.
- Employment terms meet or exceed national legal standards.

8.2 Suppliers are required to align with our policies and cascade these principles through their supply chains.

## **9. Key Performance Indicators (KPIs)**

We use the following KPIs to measure our effectiveness:

- Percentage of supply chain mapped and monitored.
- Number of suppliers audited for compliance.
- Hours of training delivered on modern slavery risks.
- Number of reported incidents and resolution timelines.

## **10. Transparency and Reporting**

10.1 We publish an annual statement outlining our modern slavery efforts, progress, and areas for improvement.

10.2 The statement is publicly available on our website and reviewed annually by our leadership team.

## **11. Continuous Improvement**

11.1 We commit to regularly updating our policies and practices to reflect the latest standards and best practices in modern slavery prevention.

11.2 Continuous dialogue with stakeholders and employees ensures that our approach remains effective and relevant.

Signed  
Maurice Laydon  
Director  
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